

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DISTRICT**

CS WANG & ASSOCIATE, <i>et al.</i>,)	Case No. 1:16-cv-11223
)	
Plaintiffs,)	
)	Hon. Rebecca R. Pallmeyer
v.)	
)	Magistrate Judge Mary M.
WELLS FARGO BANK, N.A., <i>et al.</i>,)	Rowland
)	
Defendants.)	
)	

**STIPULATION OF VOLUNTARY DISMISSAL
OF IPS DEFENDANTS WITH PREJUDICE**

Plaintiffs CS Wang & Associate, Sat Naryan dba Express Hauling, Robert Meyer dba Mangia Nosh, and Taysir Tayeh dba Chief's Market ("Plaintiffs") and Defendants International Payment Services, LLC, Brian Bentley, Adam Bentley, and Andrew Bentley ("IPS Defendants") hereby stipulate and agree as follows:

1. Plaintiffs hereby stipulate and agree to dismiss, with prejudice and on the merits, any and all claims against International Payment Services, LLC, Brian Bentley, Adam Bentley, and Andrew Bentley.

2. Each of International Payment Services, LLC, Brian Bentley, Adam Bentley, and Andrew Bentley agree to submit to the jurisdiction of the United States Court for the Northern District of Illinois for purposes of any subpoenas properly issued by Plaintiffs in connection with the case captioned above. This acceptance of jurisdiction includes, but is not limited to, the IPS Defendants' agreement to produce documents and attend depositions, hearings, or trials in the above-captioned matter pursuant to any properly issued subpoena served by Plaintiffs, in accordance with the Federal Rules of Civil Procedure. In the event the IPS Defendants are

subpoenaed to testify at trial in the Northern District of Illinois, they agree to cooperate with respect to the scheduling of their trial testimony and to appear in the Northern District of Illinois to give such testimony. The IPS Defendants further agree that service of any subpoenas to them issued by Plaintiffs may be effectuated by serving attorney Jess Krannich, whose present business office is Manning Curtis Bradshaw & Bednar, PLLC, 136 E S Temple #1300, Salt Lake City, UT 84111.

3. This stipulation does not affect any of Plaintiffs' claims against defendants Wells Fargo Bank, N.A., First Data Merchant Services, LLC, Fifth Third Bank, Vantiv, Inc., National Processing Company, Ironwood Financial, LLC, Dewitt Lovelace, or John Lewis.

4. All parties to this stipulation shall bear their own costs, expenses, and fees.

5. In the alternative, Plaintiffs and the IPS Defendants request that the Court enter an order dismissing the IPS Defendants with prejudice pursuant to Rule 41.

Dated: January 29, 2019

MYRON M. CHERRY & ASSOCIATES, LLC

By: /s/ Jacie C. Zolna
One of Plaintiffs' Attorneys

Dated: January 29, 2019

MANNING CURTIS BRADSHAW & BEDNAR, PLLC

By: /s/ Jess Krannich
Attorney for Defendants International Payment Services, LLC, Brian Bentley, Adam Bentley, and Andrew Bentley

CERTIFICATE OF SERVICE

The undersigned hereby certifies that he served the foregoing **Stipulation of Voluntary Dismissal of IPS Defendants With Prejudice** upon:

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via the electronic filing system, on the 29th day of January, 2019.

/s/ Jacie C. Zolna